

Bennett D. Krasner, Esq. (bk-8375)
 1233 Beech Street #49
 Atlantic Beach, New York 11509
 Attorney for Defendant, Federal Jeans, Inc.

**UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK**

Jennifer Perdomo.,)	
)	
Plaintiff,)	Civil Action No.
)	08-CV-00919(JGK)
v.)	
)	
Federal Jeans, Inc. and)	DEFENDANT FEDERAL JEANS,
Yoram Moussaief, in his official and individual)	INC.'S RULE 26(a)(1) INITIAL
capacities,)	<u>DISCLOSURE STATEMENT</u>
)	
Defendants.)	

Defendant, Federal Jeans, Inc., for its initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure states as follows:

I. POTENTIAL WITNESSES [Fed. R. Civ. P. 26(a)(1)(A)(i)]

The name and, if known, the address and telephone number of each individual likely to have discoverable information--along with the subjects of that information--that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

RESPONSE:

Person Having Information	Subjects
Eyal Ben-Yosef 1385 Broadway, 4 th Floor New York, NY 10018 (212) 302-5140	Support of defenses
Yoram Moussaieff 2042 Pitkin Avenue Brooklyn, NY 11207 (917) 579-7977	Support of defenses
Timothy Perry 1385 Broadway, 4 th Floor New York, NY 10018 (212) 302-5140	Support of defenses

Person Having Information**Subjects**

Victoria Evaneglou
 1385 Broadway, 4th Floor
 New York, NY 10018
 (212) 302-5140

Support of defenses

Sam Sutton
 1385 Broadway, 4th Floor
 New York, NY 10018
 (212) 302-5140

Support of defenses

Michelle Seth
 1385 Broadway, 4th Floor
 New York, NY 10018
 (212) 302-5140

Support of defenses

Richard Smith
 1385 Broadway, 4th Floor
 New York, NY 10018
 (212) 302-5140

Support of defenses

Sabina Khanukaez
 1385 Broadway, 4th Floor
 New York, NY 10018
 (212) 302-5140

Support of defenses

Yong-Ah Hwan
 1385 Broadway, 4th Floor
 New York, NY 10018
 (212) 302-5140

Support of defenses

Sarah Wilmot
 1385 Broadway, 4th Floor
 New York, NY 10018
 (212) 302-5140

Support of defenses

Roy Moussaieff
 1385 Broadway, 4th Floor
 New York, NY 10018
 (212) 302-5140

Support of defenses

Grega Berton
 1385 Broadway, 4th Floor
 New York, NY 10018
 (212) 302-5140

Support of defenses

Eliza Blakley
 1385 Broadway, 4th Floor
 New York, NY 10018
 (212) 302-5140

Support of defenses

Person Having Information	Subjects
Ravind Rampurada 1385 Broadway, 4 th Floor New York, NY 10018 (212) 302-5140	Support of defenses
Tulio Miranda Yoral, LLC 240 West 37 th Street New York, NY	Support of defenses
Plaintiff's past and present employers, which are all unknown at this time.	Support of defenses
Plaintiff's past and present boyfriends, which are all unknown at this time.	Support of defenses
Nelson Antonio Perdomo 6185 Granton Avenue, Apt. 1A North Bergen, NJ 07047	Support of defenses
Marc D. Viggiano 196 West 10 th Street, Apt. 5D New York, NY 10014 (917) 658-1565	Support of defenses

Additional individuals (or entities) with knowledge may become known to the Defendant during the course of discovery, in which case the Defendant will update these disclosures and reserves its right to supplement the disclosures made herein.

II. DOCUMENTS [Fed. R. Civ. P. 26(a)(1)(A)(ii)]

A copy--or a description by category and location--of all documents, electrically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

RESPONSE:

Defendant is unaware of any such documents at this time but such documents may become known to the Defendant during the course of discovery, in which case the Defendant will update these disclosures and reserves its right to supplement the disclosures made herein.

III. DAMAGES [Fed. R. Civ. P. 26(a)(1)(A)(iii)]

A computation of each category of damages claimed by the disclosing party--who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

RESPONSE:

Defendant is unaware of any such documents at this time but such documents may become known to the Defendant during the course of discovery, in which case the Defendant will update these disclosures and reserves its right to supplement the disclosures made herein.

IV. INSURANCE AGREEMENT [Fed. R. Civ. P. 26(a)(1)(iv)]

For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

RESPONSE:

Defendant is unaware of any insurance at this time but should it become aware of any insurance then Defendant will update these disclosures and reserves its right to supplement the disclosures made herein.

Dated: Atlantic Beach, New York
May 14, 2008

Respectfully submitted,

Bennett D Krasner

Bennett D. Krasner, Esq. (bk-8375)
Attorney for Defendant, Federal Jeans, Inc.
1233 Beech Street #49
Atlantic Beach, New York 11509
Tel. (516) 889-9353

CERTIFICATE OF SERVICE

I hereby certify that on May 14, 2008 I electronically filed the foregoing documents with the Clerk of the United States District Court, Southern District of New York, via the CM/ECF system:

Defendant, Federal Jeans, Inc.'s, Rule 26(a)(1) Initial Disclosures Statement, dated May 14, 2008.

I further certify that on May 14, 2008, I caused a true and correct copy of Defendant, Federal Jeans, Inc.'s, Rule 26(a)(1) Initial Disclosures Statement, dated May 14, 2008, to be served by placing true copies of the same in a securely sealed first class postage paid envelope, in an official depository under the exclusive care and custody of the United States Postal Service within the State of New York, upon:

Yoram Moussaieff
81-21 Ken Street
Jamaica Estates, NY 11432

Dated: Atlantic Beach, New York
May 14, 2008

Bennett D. Krasner
Bennett D. Krasner, Esq. (bk 8375)